



The Biocontrol Coalition

Advocating for EU regulation and policy that unlocks the potential for biocontrol innovation in sustainable food systems



Nearly two decades ago, the European Commission-funded REBECA project highlighted the low market presence of biocontrol products in Europe, despite their global uptake and farmers being squeezed by fewer conventional options.

2007

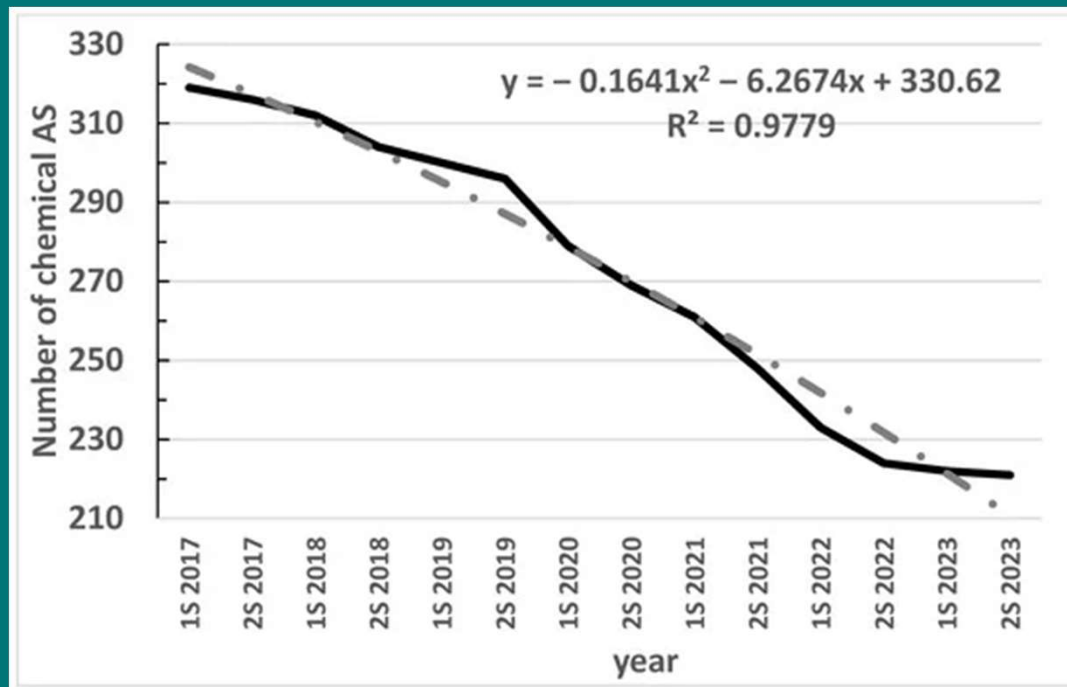


2024

Leap forward to
today, and the
situation is even
more precarious

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Farmers in Europe have lost ONE THIRD of conventional plant protection active ingredients since 2017



There are 6x more conventional plant protection products in the global pipeline than in Europe

Sources: Marchand, P.A. EU Chemical Plant Protection Products in 2023: Current State and Perspectives. *Agrochemicals* 2023, 2, 106-117.
<https://doi.org/10.3390/agrochemicals2010008> and EY Switzerland, What levers should be used for a better EU agriculture system?
www.ey.com/en_ch/innovation/what-levers-should-be-used-for-a-better-eu-agriculture-system

EU farmers have 8 fewer biocontrol products net since 2019

- Since 2019, 13 biocontrol active ingredients have been approved, but 21 have been non-renewed, withdrawn or expired¹
- No biological active ingredient has been approved in 2 years
- More than 100 biocontrol substances should be submitted for approval by 2028, but will not be on the market before 2035²

Sources: 1) CropLife Europe calculations; 2) IBMA survey <https://ibma-global.org/latest-news-2/press-release-27th-april-2023>

Biocontrol products are generally focused more narrowly than conventional pesticides

- Biocontrol products mainly focus on gardening, viticulture, and arboriculture, leaving **cereals, arable crops, or horticulture with few options** at the moment
- The range of biocontrol products is often **more targeted**, either terms of crop or the pests and diseases they counter
- Biocontrol products are often **most effective when used together with conventional** PPPs in integrated pest management

Farmers' plant protection toolboxes are shrinking rapidly

OLD FARMER TOOLBOX

- Loss of one-third of farmers' chemical crop protection tools since 2017
 - + Slow drip of biocontrol products coming to the market
(assume an average of 5 per year)
 - More targeted range of most biocontrol products
-

**TODAY'S FARMER TOOLBOX
IS AT LEAST 22% SMALLER
THAN IN 2017**



The shrinking toolbox increases risks of:

- Major crop failures
- Pests developing resistance to the few remaining products
- Inability to manage shifting pest and disease patterns

If Europe is going to be competitive, while meeting Green Deal objectives and consumer demands, we need a radical re-think of how biocontrol products are placed on the market.

How can EU regulation enable and accelerate farmers accessing more biocontrol products while continuing to protect people and the environment?



The Biocontrol Coalition is a **multistakeholder platform** advocating for the European Union to rethink its framework for agriculture and food, particularly for biocontrol, to enlarge the farmer toolbox while ensuring safety and health and protecting the environment.



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Biocontrol Coalition members

Grower organisations



COPA-COGECA participates actively without having officially joined the Coalition yet.

Consumer organisations and NGOs



Biocontrol producers (who finance the Coalition)



National associations of biocontrol producers



Regulatory consultancies



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Innovation allies support our cause, but are not involved in daily advocacy



Due to
fragmented
markets and
slow time-to-
market, the
return on
investment in
Europe is 30%
below the
global average



Source: EY Switzerland, What levers should be used for a better EU agriculture system? www.ey.com/en_ch/innovation/what-levers-should-be-used-for-a-better-eu-agriculture-system

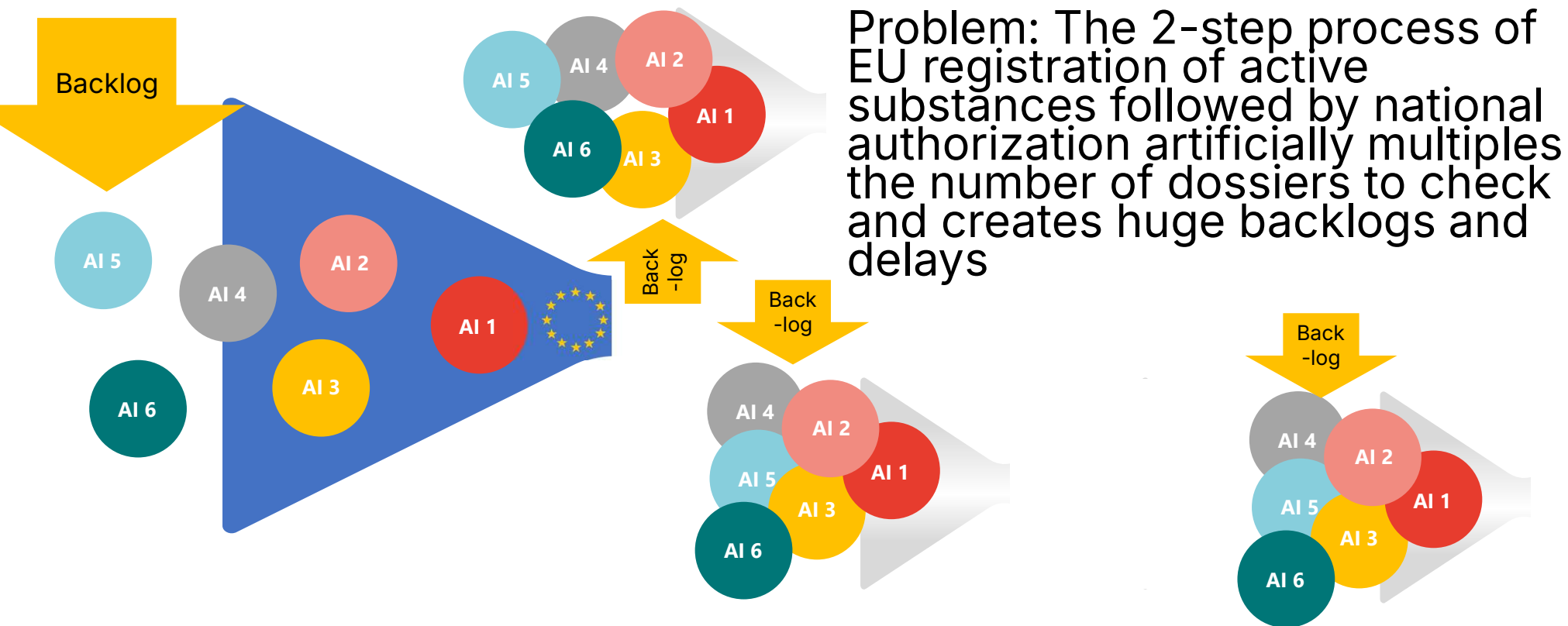


Problem: Fragmented markets worsen the business case for investing in biocontrol products

Solution: A Single Market for biocontrol products

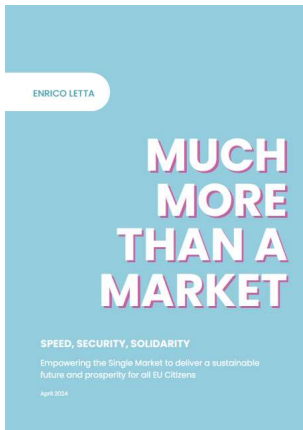


The time to market for a biocontrol product in European Member States takes 7-9 years, compared to 2-3 years in other key global markets



Solution: A Single Market for biocontrol products

A Single Market approach for biocontrol is in line with the observations of the Letta and Draghi reports



The **Single Market is undermined** by "excessive regulatory burden and bureaucratic red tape" (including "gold plating" by MS), creating "additional costs on businesses, proving unsustainable for SMEs and inadvertently favouring non-European companies"

"We are **failing to translate innovation into commercialisation**, and innovative companies that want to scale up in Europe are hindered at every stage by inconsistent and restrictive regulations."



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How can we
improve the
situation?



Essential elements of a dedicated, robust regulatory framework for biocontrol products in the EU

- A harmonised, innovation-friendly definition of biocontrol products
- A single market with timely one-step evaluation
- Claims-based efficacy evaluated in the context of intended use, which may include complementary use with other plant protection products

Our call for a dedicated framework for biocontrol products aligns with many EU policy developments today

- The March 2024 [Communication on Building the future with nature](#) calls for reducing fragmentation, simplification, and shortening the time to market for biotech innovations, as well as addressing national regulatory obstacles which impede an effective single market.
- The final report of the Strategic Dialogue on the Future of EU Agriculture called on the Commission to enable a robust legislative framework for biocontrol products by 2025
- In his confirmation hearing on 4 November 2024, Commissioner C. Hansen acknowledged the need to speed up the authorisation of biocontrol products



Defining biocontrol products should be a priority

- A harmonised European definition of biocontrol products is necessary to differentiate this product category from “conventional” plant protection products and to provide a legal basis for a dedicated regulatory framework.
- The definition needs to distinguish between “biocontrol products” which are placed on the market under specific rules (currently Reg(EC) 1107/2009) and “biocontrol practices” which are the subject of the Sustainable Use Directive, the Common Agricultural Policies, and other instruments
- The definition needs to be open to recent and future innovations in biocontrol products

A dedicated, robust legislative framework needs to provide all EU farmers equal access to biocontrol products

- A **single authority and timely one-step evaluation**:
 - Allows all EU farmers to have equal access to a robust toolbox for plant protection
 - Aggregates fragmented national/zonal markets to make them more attractive for investment
 - Pools scarce resources (for authorities as well as companies)
 - Shortens time-to-market by eliminating a second waiting period in the two-tier registration/authorisation process
 - Ensures harmonised interpretations of rules across the EU
- **Claims-based efficacy should be evaluated in context** of intended use, not in isolation from real-world practices

Short-term improvements to the current regulation are important interim steps

- Any significant rethink of the regulatory framework will take time
- Tweaks to the current framework remain important in the interim (but are not the focus of the Coalition's work)
 - provisional authorization
 - Improving mutual recognition
 - involving EFSA from the start
 - etc.
- A growing number of analyses such as the [Commission's own Fit4Future platform](#) and [EY's analysis](#) show that these improvements can only help so much

The Biocontrol Coalition's activities and accomplishments in 2024

Advocacy

Open Letter to the EU



- Written submission to the EU's Strategic Dialogue on the Future of Agriculture and several of our farmer members were participants and relayed the Coalition's messages
- [Open letter to Pres. von der Leyen](#)
- One-to-one meetings with policymakers in the Commission, Council, Permanent Representations and Members of the European Parliament (MEPs)
- Submitted model questions to MEPs for the Commissioner-Designate hearings
- Follow-up messages to Commissioners-Designate Hansen and Varhelyi after the publication of their written submissions

Webinars and podcasts



[Watch our webinar "The benefits of biocontrol for farmers and consumers"](#)

[Watch our webinar "Do we need a Single Market for Biocontrol?"](#) featuring representatives from the Permanent Representation of the Netherlands to the EU, Rovensa Next and Syngenta.



[Listen to the New Ag podcast](#) introducing the Biocontrol Coalition with Supporting members ASAJA (Spanish farmers) and Consumers Choice Center

New AG
International



PODCAST



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Signs of impact

- The final report of the Strategic Dialogue on the Future of EU Agriculture contains a detailed call for the Commission to enable a robust legislative framework for biocontrol products by 2025 (thanks to our farmer members!)
- A written parliamentary question to Commissioner-Designate Varhelyi specifically asked about biocontrol
- Although his written response did not explicitly mention biocontrol, to Commissioner-Designate Hansen mentioned the need to accelerate and simplify the process for bringing biocontrol products to market in the opening remarks of his EP hearing

Looking ahead to 2025 – advocacy focus areas

- **Regulatory Framework:** Once the work item is secured in the Commission's Work Programme, continued engagement is necessary to make sure that the new framework contains the key elements our Coalition has identified
- **Broaden advocacy to include more training and other support for farmer uptake:** Access to biocontrol products is a precondition for their use, but farmers will also require additional support to learn about how to integrate the growing offering of biocontrol products into management practices effectively
- **Strengthen Membership:** We want to involve more farmer groups, environmental NGOs, key stakeholders and additional biocontrol producers to build momentum.
- **Creating a pull factor from the downstream food chain:** Continue to increase awareness of downstream food chain actors that their ability to meet consumer demands depends on farmers' ability to access biocontrol.

How to join the Biocontrol Coalition

Coalition membership is open to **any organization interested in advocating for EU farmers to have access to more biocontrol products on an equal footing**. Conditions for membership are as follows:

- Engaging actively in the coalition calls, meetings, and ongoing work
- Respecting the principles of engagement and governance that were agreed by the founding members
- Refraining from using the Coalition's name to imply endorsement of any position that is outside the scope and mandate of the coalition
- In addition, **manufacturers of biocontrol products are only eligible to join if they contribute resources to fund the coalition** according to the agreed size policy



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cultivate change, harvest value

Together we can secure
the conditions to
promote EU agrifood
innovation!

The Biocontrol Coalition is convened and
managed by Prospero & Partners

Biocontrol innovation serves sustainable food systems

- Plant protection helps ensure that a **maximum amount of the food planted is harvested and hasn't rotted** when it reaches your plate.
- Farmers need a variety of plant protection products, including biocontrol, to **tailor their production to local conditions**.
- Climate change means that farmers are fighting **new pests**.
- More biocontrol products **complement a declining offer of conventional** plant protection products.
- A **diverse range** of plant protection products, including biocontrol, is **critical to combat pest resistance**.
- A variety of plant protection products, including biocontrol, allow farmers to tailor production to **consumer preferences and food industry specifications**



Effective plant protection is a key element of protecting Europe's existing biodiversity



An olive grove suffering from *Xylella fastidiosa* in Italy

Farmers are asking for more biocontrol

"We advocate for safer and environmentally sustainable alternatives to support disease-resistant and climate-resilient crops. **Emphasising the importance of research and authorisation, we call for concerted efforts to make these products available to farmers as soon as possible.**

Biocontrol agents (such as predators, parasitoids, microorganisms, and peptides)...[meet] the broader societal aspiration to have more natural solutions.

The uptake of biocontrol in the EU has been slow, and there are several challenges to be addressed, such as regulatory barriers or knowledge gaps. Policy makers must address these challenges and support the adoption of increased innovation of natural solutions in crop protection, by **adapting the current EU regulatory and policy framework.** (ELO)

ELO calls on the EU to push a strategic autonomy agenda that includes land-based sectors by:

4. **Strengthen research and innovation** in crop protection, ensuring a high level of safety and security for the future. ELO urges EU policy makers to prioritise swift implementation of the regulation on new breeding techniques (NGTs). We advocate for safer and environmentally sustainable alternatives to support disease-resistant and climate-resilient crops. Emphasising the importance of research and authorisation, we call for concerted efforts to make these products available to farmers as soon as possible.

Biocontrol agents such as predators, parasitoids, microorganisms and peptides are natural alternatives to chemical crop protection. They are safer for the environment and help to maintain the ecological balance. ELO calls on the Commission to support the adoption of increased innovation of natural solutions in crop protection, by adapting the current EU regulatory and policy framework.



"It is an absolute necessity for all farmers that new active substances, with lower impacts on environment and health, whether chemical-synthetic or from biological origin, are **approved in a timely manner.**"
(COPA-COGECA)



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President von der Leyen: **"We need more dialogue and a different approach."**

Our coalition welcomes this engagement and calls for a **focus in the next Commission's work program on unleashing innovation to foster biocontrol innovation and use.**

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How to become an Innovation Ally

Organisations that support the objectives of the Biocontrol Coalition but that are not able to engage in active advocacy with us are eligible to be listed as Innovation Allies on our communication materials.

- Respecting the principles of engagement and governance that were agreed by the founding members
- Refraining from using the Coalition's name to imply endorsement of any position that is outside the scope and mandate of the coalition
- Engaging with other Coalition members in good faith
- Innovation Allies are not involved in the daily work of advocacy.
- Manufacturers of biocontrol products are not eligible to be Innovation Allies.

Our coalition's principles of engagement

- Curiosity instead of judgment
- Respecting diverse views
- Openness to enquiry
- Respecting confidentiality where necessary
- Application of Chatham House Rule where appropriate (no one should be explicitly quoted without consent)
- Consensus building wherever possible
- Pragmatism over ideology (with a spirit of compromise)

Our coalition's governance

- We will always strive for consensus
- Where it is not possible, we will decide by 2/3 majority
- For the moment, a quorum for decision-making requires all members to voice their preference
- The secretariat is empowered to act as the coalition's spokesperson for general inquiries
- For meetings with stakeholders and decision-makers, the secretariat will always be accompanied by at least one member organisation, selected according to relevant competency and availability